

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>MARY CHANDLER,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Case No. 3:10cv-1219</b>
	)	<b>Judge Campbell</b>
<b>TENNESSEE DEPARTMENT OF SAFETY</b>	)	<b>Magistrate Judge Bryant</b>
<b>And DAVID MITCHELL, as Commissioner of</b>	)	<b>JURY TRIAL</b>
<b>The Tennessee Department of Safety,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	
	)	

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**REVISED - PARTIES' STIPULATED EXHIBIT LIST FOR TRIAL**

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As evidenced by signature of counsel hereto, the parties stipulate to the authenticity and admissibility of the following documents and audio recordings at trial of this matter, which is set for trial on January 21, 2014:

- Exhibit #1: June 1, 2000, Federal Drivers Protection Act, Tennessee Department of Safety Driver Data Information Request Form, Policies and Procedures for Obtaining Computer Stored Records and General (Re: Payments).
- Exhibit #2: July 19, 2010 Email (1:20 pm) of Mary Chandler to Glen Cruzen Re "Bozo" in which Mary Chandler sends drivers license print screen for Timothy Clark to Glen Cruzen.
- Exhibit #3: July 19, 2010 Email (3:14 pm) of Glen Cruzen to M. Schmidt Re "Confirmed" in which Cruzen confirms Mary Chandler sent drivers license print screen to Glen Cruzen.
- Exhibit #4: August 3, 2010 – Email (11:00 am) from Timothy Clark to Sgt. Hollandsworth forwarding email chain, including 8/2/10 email of Glen Cruzen to Timothy Clark in which Cruzen attached Cruzen's July 19, 2010 Email (3:14 pm) to M. Schmidt Re "Confirmed" in which Cruzen confirms Mary Chandler sent drivers license print

screen to Glen Cruzen.

- Exhibit #5: August 3, 2010 Email (3:24 pm) Timothy R. Clark to David Hollandsworth Re updating mailing address (redacted to comply with statute).
- Exhibit #6: August 6, 2010 – Email (2:15 pm) from David Hollandsworth to Mary Chandler, enclosing Notification letter to Employee Re AD2010-0068.
- Exhibit #7: August 6, 2010 – Memorandum of Notification from Captain Betty Blair (OPR) to Programmer/Analyst/Mary Chandler (Subject AD2010-0068 - Regarding conducting an investigation into a civilian complaint).
- Exhibit #8: August 9, 2010 - Email (12:56 pm) from Mary Chandler to David Hollandsworth Re Notification letter to Employee Re AD2010-0068 and the investigation into a civilian complaint.
- Exhibit #9: August 11, 2010 - Email (11:11 am) from David Hollandsworth to Timothy Clark Re request for permission to show Clark's drivers license information at issue to Home Depot employee, if employee can be located.
- Exhibit #10: August 11, 2010 - Email (11:14 am) from Timothy Clark to David Hollandsworth providing permission Re showing Clark's drivers license information at issue to Home Depot employee, if employee can be located.
- Exhibit #11: August 13, 2010 (10:05 am) Admonition of Rights to Program Analyst 4 Mary Chandler and witnessed by Sgt. Stan Hollandsworth and Sgt. Lowell Russell.
- Exhibit #12: August 13, 2010 – approx. 1:21 pm – Tennessee Department of Safety Notice of Employee Resignation/Termination of Program Analyst 4 Mary Chandler and accepted 8/13/10 by Commissioner D. Mitchell (redacted to comply with statute).
- Exhibit #13: August 13, 2010 - Email (4:01) from Paul Battenfield to Atherton and Castro Re resignation of Mary Chandler and request for backup tapes and email accounts as well as confirming Chandler's access has been suspended.
- Exhibit #14: August 13, 2010 Electronic Recordings of the two meetings with Plaintiff, occurring on August 13, 2010. The 10:05 a.m. interview was done by Sgt. Hollandsworth. The 1:20 p.m. discussion was conducted by Russell.
- Exhibit #15: August 13, 2010 the certified transcript of the Electronic Recordings of the two meetings with Plaintiff, occurring on August 13, 2010.

- Exhibit # 16: February 16, 2011, Declaration of Sgt. Lowell Russell with Attachments.
- Exhibit # 17: February 16, 2011, Declaration of Sgt. Stan Hollandsworth with Attachments.
- Exhibit # 18: February 16, 2011, Declaration of Sgt. Paul R. Battenfield with Attachments.
- Exhibit # 19: February 16, 2011, Email from Glen Cruzen to David Hollandsworth.
- Exhibit # 20: August 3, 2010 Complaint (including emails) of Clark against Department Member, Plaintiff received and completed by Hollandsworth (redacted to comply with statute).
- Exhibit # 21: August 25, 2010 Memorandum to Lt. Lewis from Sgt. Russell (Exhibit 5 to Deposition of Sgt. Russell).
- Exhibit #22: August 13, 2010 Memorandum to Mary Chandler from Mitchell: Subject, Administrative Leave Pending Investigation.
- Exhibit #23: August 27, 2010 Summation report on Mary Chandler submitted by Sergeant Hollandsworth and Sergeant Russell.

**Respectfully submitted,**

**ROBERT E. COOPER, JR.  
ATTORNEY GENERAL AND REPORTER**

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 16, 2014, a copy of the foregoing Revised Stipulated Exhibit List was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt as follows:

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All other parties will be served notice of this filing by regular U.S. mail as follows:

None

Parties may access this filing through the Court's electronic filing system.

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